IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

**CHARLESTON DIVISION** 

IN RE: COLOPLAST CORP. PELVIC SUPPORT SYSTEMS PRODUCTS LIABILITY LITIGATION

MDL No. 2387

\_\_\_\_\_

THIS DOCUMENT RELATES TO ALL CASES

**CROSS-NOTICE OF VIDEO DEPOSITION OF DANIEL J. CHRISTENSEN** 

TO: ALL COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that the deposition of DANIEL J. CHRISTENSEN will be taken jointly in connection with *In Re: C.R. Bard, Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2187, upon oral examination on February 19, 2014, at 9:00 a.m., at the offices of Spilman Thomas & Battle, PLLC, Spilman Center, 300 Kanawha Boulevard East, Charleston, West Virginia 25301.

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure and the procedures set forth in *In Re: Coloplast Corp. Pelvic Support Systems Products Liability Litigation*, MDL No. 2387, Defendant Coloplast Corp. hereby crossnotices this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendant Coloplast Corp. further states that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in *In Re: C.R. Bard, Inc. Pelvic Repair System Products Liability Litigation*, MDL No. 2187 and *In Re: Coloplast Corp. Pelvic Support Systems Products Liability Litigation*, MDL No. 2387.

The deposition will be taken before a person authorized by law to administer oaths and videotaped.

Dated: February 17, 2014

Respectfully submitted,

/s/ Lana K. Varney\_

Lana K. Varney
Fulbright & Jaworski L.L.P.
98 San Jacinto Boulevard, Suite 1100
Austin, TX 78701
Talanhara (512) 526 4504

Telephone: (512) 536-4594 Facsimile: (512) 536-4598

lana.varney@nortonrosefulbright.com

Ronn B. Kreps Fulbright & Jaworski L.L.P. 2100 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 321-2810

Facsimile: (612) 321-2288 ronn.kreps@nortonrosefulbright.com

Counsel for Defendant Coloplast Corp.

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

